

**REMARKS**

Based upon the foregoing amendments and following comments, Applicants respectfully request reconsideration and allowance of the application.

Claims 1-58 are pending and at issue. Of these, claims 1, 24, and 50 are independent claims. By way of this amendment, independent claims 24 and 50 have been amended in order to more clearly recite what Applicants regard as the invention, and not for reasons related to overcoming any cited prior art reference. No new matter has been added. See, for example, claim 1 of the application as originally filed.

**Oath/Declaration Objection**

Applicants acknowledge the informality indicated by the Examiner with regard to the identification of Applicants' zip code information in the application papers. In response to the Examiner's request for a statement over Applicants' signature, the following statement of complete post office address information, including zip code information, is provided by Applicants to cure the informality:

Dan Dean Christensen  
9001 Martha's Drive  
Austin, Texas 78717

Steven Lee Dienstbier  
2212 Mockingbird Drive  
Round Rock, Texas 78681

In the event that any further information or action is deemed necessary by the Examiner, Applicants respectfully request that the Examiner contact the undersigned at the number indicated below.

**Claim Rejections Under 35 U.S.C. 102(e)**

Claims 1-58 stand rejected under 35 U.S.C. 102(e) as anticipated by Sawada U.S. Patent No. 6,735,619 ("Sawada"). Applicant respectfully traverses this rejection, and the assertions and determinations therein, for at least the following reasons. Applicants respectfully request reconsideration and withdrawal of these rejections.

Independent claim 1 recites, in part, the steps of making first and second network identification tags available on first and second I/O networks, respectively, i.e., the I/O networks for which the first and second network identification tags were created. Sawada does not teach or suggest either of these steps of claim 1 for at least

the following reasons. In contrast, the cited portions of Sawada appear to involve detecting when a device, such as a lamp or a camera, is connected to a node of an IEEE 1394 bus for a home network, after which a “node ID” and “unique ID” of the device are read. See Sawada, col. 6, lines 22-27. The device ID is a number specific to each device and consists of a manufacturer name and serial number. See Sawada, col. 5, lines 30-33.

Neither the node ID nor the unique device ID, either individually or as an ID pair, is made available on first or second I/O networks of a plurality of I/O networks, much less on the I/O network for which the ID was created, as required by claim 1. In contrast, after the ID pair is determined, the ID pair is only used to create a homepage and to control operation of the home network, insofar as Sawada is ultimately interested in establishing a gateway for remote control of the devices. Making the ID pair otherwise available at this point is not necessary, because the device is already connected to the bus. Once the device is connected, making any network identification tag available on an I/O network for which it was created is no longer potentially relevant to, and not taught by, the system of Sawada.

Reference is made by the Examiner to the steps taken in Sawada following a new device connection, namely, a reset of the IEEE 1394 bus. Even if the node IDs or node/device ID pairs of Sawada constitute a network identification tag created for an I/O network, as recited in claim 1, the steps following a bus reset (see Figure 8) do not involve making a previously created network identification tag available on an I/O network. Rather, these steps involve reading node and device IDs for new ID assignments and pairings (steps 131, 138), and collecting device information from the newly connected home device. See, e.g., Sawada, col. 6, lines 22-28, and col. 9, lines 25-45.

The node and device ID reading steps (131, 138) do not involve making a previously created network identification tag available, as recited in claim 1, because the bus reset causes all existing node IDs to be discarded, and new node IDs are assigned. See Sawada, col. 9, lines 49-55. It follows that the previous node IDs (and ID pairs) are not made available, as recited in claim 1. And with the previous node IDs discarded, each device ID's sole association with a network node is lost. That is, the device ID needs to be paired with an assigned node ID before it can be said to constitute a network identification tag for an I/O network (as opposed to simply an

identification of the device itself). But the pairing with the new node ID has yet to occur when the device ID is read (see Sawada, Figure 8, step 140). Therefore, the device ID reading step also fails to constitute making available a network identification tag for the particular I/O network for which it was created. For at least these reasons, Applicants respectfully submit that the teachings of Sawada in connection with a bus reset fail to disclose the step of making first and second network identification tags available on first and second I/O networks of a plurality of I/O networks.

Applicants further respectfully submit that Sawada fails to suggest a method in which a network identification tag is made available on an I/O network for which it was created. Because the devices have already been connected to the IEEE 1394 bus, there is no motivation to make network identification tags available to avoid an improper device connection. In short, the necessary connections are already established.

Furthermore, Sawada fails to provide motivation for the making of network identification tags available on I/O networks because of the very nature of the IEEE 1394 plug-and-play feature on which the teachings of Sawada are based. Sawada is not concerned about where devices, such as a lamp or camera, are connected, because the plug-and-play feature will automatically recognize the device and enable its operation. In short, misconnections are not possible with the IEEE 1394 bus.

For at least the reasons set forth above, it is respectfully submitted that Sawada fails to disclose or suggest every element or step of claim 1. It follows that claim 1 and, by implication, claims 2-23 dependent thereon, are patentable over the cited reference and, accordingly, Applicants respectfully requests allowance of claims 1-23.

Independent claim 24, as amended, recites, in part, first and second units of a process control system that are communicatively coupled to first and second I/O networks, respectively, and that are adapted to make first and second unique network identification tags for the first and second I/O networks available on the first and second I/O networks, respectively. Independent claim 24, and by implication claims 25-49 dependent thereon, require that network tags be made available on the I/O networks with which they are associated. As discussed above in connection with claim 1, Sawada fails to disclose or suggest making first and second network identification tags available on first and second I/O networks, respectively, much less

first and second network identification tags for the first and second I/O networks. As a result, claims 24-49 are allowable for at least the reasons discussed above in connection with claim 1. Thus, for at least these reasons, claims 24-49 are patentable over the cited reference and, accordingly, Applicants respectfully request allowance of claims 24-49.

Independent claim 50, as amended, recites, in part, a diagnostic tool for identifying a selected I/O network for which a network identification tag has been made available, the diagnostic tool comprising a first routine to receive the network identification tag, and a second routine to identify the selected I/O network based on the received network identification tag. Sawada does not teach or suggest either of these routines of claim 50 for at least the following reasons.

As a preliminary matter, Applicants respectfully traverse the position taken by the examiner that the initialization process performed in accordance with the IEEE 1394 standard is equivalent to a diagnostic tool. First, Applicants respectfully submit that, setting aside the notion of equivalence in this context, a diagnostic tool is not disclosed by Sawada. It is further respectfully submitted that the teachings of Sawada fail to suggest a diagnostic tool or, more specifically, a diagnostic tool for identifying a network. The IEEE 1394 standard is directed to automatic recognition and operation of a device in a plug-and-play fashion. In contrast, a network diagnostic tool is useful outside of device recognition and automatic operation. As set forth above in connection with claim 1, an advantage of the IEEE 1394 standard is that a device may be plugged in (and automatically played) anywhere in the network. There is no need to diagnosis the network, or identify a location within the network. For these reasons, Sawada fails to provide motivation for a diagnostic tool for identifying a selected network, as recited in claim 50.

Even if one considers that Sawada presents aspects of a diagnostic tool, Applicants respectfully submit that Sawada fails to disclose or suggest a routine to identify a selected I/O network based on a received network identification tag, as recited in claim 50, for at least the following reasons. With reference to the reasons set forth above in connection with claims 1 and 24, Sawada fails to disclose or suggest a network identification tag made available on the I/O network with which it is associated. Without such network identification tags, it follows that an identification of an I/O network cannot be made as recited in claim 50.

More generally, Sawada fails to disclose a routine to identify an I/O network because Sawada, and the IEEE 1394 standard upon which the Sawada system is based, teaches a technique for identifying devices attached to the IEEE 1394 bus. It does not identify networks, but rather devices attached thereto.

Further, it is respectfully submitted that the portions of Sawada cited by the Examiner in connection with claim 50 also fail to disclose or suggest the recited routine. These portions refer to the steps of reading node IDs and collecting device information once a new device is detected on the IEEE 1394 bus. As explained above, the node IDs are assigned at this point (rather than received), and the device information is device-specific. Accordingly, neither of these steps teaches or suggests a routine to identify a selected I/O network based on a received network identification tag.

Thus, it is respectfully submitted that Sawada fails to disclose every element of claim 50 for at least the reasons set forth above. It follows that independent claim 50, and by implication claims 51-58 dependent thereon, are patentable over the cited reference and, accordingly, Applicants respectfully request allowance of claims 50-58.

**CONCLUSION**

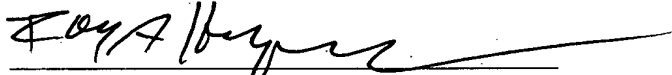
Applicants have now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and allowance of claims 1-58.

Although Applicants believe that no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 13-2855 of Marshall, Gerstein & Borun LLP. In addition, if a petition for an extension of time under 37 CFR 1.136(a) is necessary to maintain the pendency of this case and is not otherwise requested in this case, Applicants request that the Commissioner consider this paper to be a request for an appropriate extension of time and hereby authorize the Commissioner to charge the fee as set forth in 37 CFR 1.17(a) corresponding to the needed extension of time to Deposit Account No. No. 13-2855 of Marshall, Gerstein & Borun LLP. A copy of this paper is enclosed herewith.

If there are matters that can be discussed by telephone to further the prosecution of this application, Applicants respectfully request that the Examiner call their attorney at the number listed below.

Respectfully submitted,

By:

  
Roger A. Heppermann  
Registration No. 37,641  
MARSHALL, GERSTEIN & BORUN LLP  
6300 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606-6357  
Tel.: (312) 474-6300  
Fax.: (312) 474-0448

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